

Exhibit 8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

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WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF CAMERON POETZSCHER

SAN FRANCISCO, CALIFORNIA

MONDAY, JUNE 19, 2017

BY: ANDREA M. IGNACIO,
CSR, RPR, CRR, CCRR, CLR
CSR LICENSE NO. 9830
JOB NO. 2642012

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1 Google? 14:42

2 A Either returned to Google, disposed of, 14:42
3 whatever. This was something that was portrayed to us 14:42
4 as something that had happened in the past. He had 14:42
5 just discovered that he still had the backed-up disks 14:42
6 that had the old backup of the computer that he no 14:42
7 longer had. 14:42

8 Q And -- and you don't know specifically what 14:42
9 happened to the hard drive? 14:42

10 A No, I don't. 14:42

11 Q So, once Mr. Levandowski told the group at 14:42
12 this meeting that he'd discovered these disks from the 14:43
13 backup system, what -- what was he told to do? 14:43

14 A So Travis said, Do not bring anything from 14:43
15 Google or otherwise to Uber. 14:43

16 Q Anything else? 14:43

17 A Did Travis say anything else? 14:43

18 Q Yes. 14:43

19 A No, not -- not then, no. 14:43

20 Q Did anybody else at the meeting say anything 14:43
21 else? 14:43

22 A Yes. So I then said, Yeah, get rid of it. 14:43

23 And then Travis immediately -- as soon as I 14:43
24 said that, Travis pointed at me and looked at Anthony 14:43
25 and said, Don't listen to him, you know. Talk to your 14:43

1 lawyer. 14:43

2 And then, as soon as Travis said that, I 14:43

3 realized I had said an ill-advised thing. And so I 14:43

4 said, "Yeah, listen to Travis, not me," or something 14:43

5 to that effect. 14:43

6 So that all happened in quick sequence. 14:43

7 Q Okay. So Travis told Mr. Levandowski, We 14:43

8 don't want you to bring the Google stuff to Uber; 14:43

9 right? 14:43

10 A Correct. 14:43

11 Q You told Mr. Levandowski to get rid of it? 14:43

12 A Correct. 14:43

13 Q And then Travis corrected you and said, No, 14:43

14 talk to your lawyers? 14:43

15 A Uh-huh. He immediately corrected me and 14:43

16 said, "Don't listen to him," as in me. "Talk to your 14:44

17 lawyer." 14:44

18 And then I immediately, you know, endorsed 14:44

19 Travis' correction of myself and said, Yeah, don't 14:44

20 listen to me. Talk to your lawyer. 14:44

21 Q And this was all at that same meeting? 14:44

22 A This was all at that same meeting. 14:44

23 Q Did anyone, other than you and Travis, 14:44

24 respond to Mr. Levandowski's revelation that he had 14:44

25 found these five backup disks in his possession? 14:44